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6 Attorneys for Defendants
7 SHANGHAI ZHENHUA HEAVY
8 INDUSTRIES CO., LTD. (erroneously
sued as SHANGHAI ZHENHUA
PORT MACHINERY CO., LTD) AND
SEASIDE TRANSPORTATION SERVICES, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

15 JACKIE ARNETT,
16 Plaintiff,
17 vs.
18 SHANGHAI ZHENHUA PORT MACHINERY
19 CO. LTD.; SEASIDE TRANSPORTATION
20 SERVICES, LLC; WHITNEY EQUIPMENT
LLC; and DOES 1 through 100, inclusive,
Defendants.

Case No. 13-cv-01672

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINES**

Judge: Hon. Vince G. Chhabria

Complaint Filed: March 1, 2013

1 WHEREAS, Plaintiff Jackie Arnett filed her complaint for damages naming only Defendants
2 Whitney Equipment LLC (“Whitney”) and Seaside Transportation Services, LLC (“STS”) in
3 Alameda County Superior Court on March 1, 2013.

4 WHEREAS defendants Whitney and STS removed this case to the Northern District on April
5 12, 2013.

6 WHEREAS on September 13, 2013, Plaintiff filed a First Amended Complaint adding
7 defendant Shanghai Zhenhua Heavy Industries Co., Ltd. (erroneously sued as Shanghai Zhenhua Port
8 Machinery Co., Ltd., hereinafter “ZPMC”).

9 WHEREAS Plaintiff filed a Second Amended Complaint on November 4, 2013 in response
10 to ZPMC’s motion to dismiss Plaintiff’s First Amended Complaint.

11 WHEREAS ZPMC filed a motion to dismiss Plaintiff’s Second Amended Complaint, which
12 was granted in part and denied in part on January 13, 2014.

13 WHEREAS The Court granted Plaintiff leave to amend her negligence allegations in order to
14 clarify what conduct each defendant has allegedly engaged in that supports each of the theories
15 underlying her negligence causes of action.

16 WHEREAS Plaintiff filed her Third Amended Complaint on February 3, 2014, and parties
17 responded.

18 WHEREAS the Court set a Pre-trial Scheduling Order on April 1, 2014.

19 WHEREAS the Court amended the Pre-trial Scheduling Order on February 2, 2015, and
20 ordered parties to complete expert discovery by April 3, 2015.

21 WHEREAS parties have completed all noticed expert depositions except for the deposition of
22 Plaintiff’s expert Louis Cheng due to schedule conflicts.

23 WHEREAS parties are available to depose Mr. Cheng on April 10, 2015.

24 WHEREAS parties now request an extension of the expert discovery deadline for the limited
25 purpose of completing Mr. Cheng’s deposition on April 10, 2015.

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1 NOW THEREFORE, IT IS STIPULATED by and between the parties, subject to the approval
2 of the Court pursuant to Local Rule 6-2, to extend discovery deadlines set in the case schedule (Dkt.
3 Nos. 69, 84, 95) as follows:

5 EVENT	6 CURRENT DEADLINE	7 REQUESTED 8 EXTENSION 9 DATE
10 Close of Expert Discovery for the 11 Limited Purpose of Deposing Mr. 12 Louis Cheng	13 April 3, 2015	14 April 10, 2015
15 Dispositive Motions Heard by	16 May 28, 2015	17 May 28, 2015 18 (no extension 19 requested)

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K&L GATES LLP

Dated: 4/7/15

By: Michele C Barnes
MICHELE C. BARNES
ROSEANNA M. CASTILLO
Attorneys for Defendants
SHANGHAI ZHENHUA PORT
MACHINERY CO., LTD

ARCHER NORRIS

Dated: 4/7/15

By: /s/ Keith R. Gillette
KEITH R. GILLETTE
CHAD D. GREESON
Attorneys for Defendant
WHITNEY EQUIPMENT, LLC

Dated: 4/7/15

WILSON ELSER LLP

By: /s/ William Enger
William Enger
Attorneys for Defendant SEASIDE
TRANSPORTATION SERVICE

Dated:

THE ARNS LAW FIRM

By: ROBERT S. ARNS
JONATHAN E. DAVIS
Attorneys for Plaintiff
JACKIE ARNETT

1 PURSUANT TO STIPULATION, IT IS SO ORDERED
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4 Dated: April 8, 2015

5 By:

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8 Hon. Vince G. Chhabria
9 U.S. District Court Judge

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